

EXHIBIT 4

1 Robert Bonsignore appearing *pro hac vice*
2 Bonsignore Trial Lawyers, PLLC
3 23 Forest Street
4 Medford, MA 02155
5 Office Phone: (781) 350-0000
6 Cell Phone: (781) 856-7650
7 Facsimile: (702) 852-5726
8 rbonsignore@classactions.us
9 Counsel for Anthony Gianasca
10 ***Interim Co-Lead Counsel for Indirect***
11 ***Purchaser Plaintiffs ORS Subclass***

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

11 ANTHONY GIANASCA AND BARBARA
12 CALDWELL

13 *on behalf of themselves and all*
14 *others similarly situated,*

15 Plaintiffs,

16 v.

17 LG ELECTRONICS, INC., et al.,

18 Defendants.

Master File No. 4:08-cv-1559

Related MDL No. 1917

**DECLARATION OF ROBERT J.
BONSIGNORE IN SUPPORT OF
PLAINTIFF'S MOTION TO AMEND
COMPLAINT**

Hearing Date: December 15, 2022

Time: 2:00 pm

Courtroom: Via videoconference

Judge: Hon. Jon S. Tigar

DECLARATION OF ROBERT J. BONSIGNORE

I, Robert J. Bonsignore, hereby declare:

1. I am an attorney at Bonsignore Trial Lawyers, PLLC and counsel of record for Plaintiff Anthony Gianasca. I am admitted, *pro hac vice*, to practice law before this Court. I submit this Declaration in support of Plaintiff's Motion to Amend Complaint. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could and would competently testify thereto.

2. My office attempted to reach defense counsel by telephone about Plaintiff's Motion to Amend Complaint and messages were left if defense counsel was not reached. Those who my office was able to speak to informed us that they do not consent this motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 16th day of September 2022, at Las Vegas, Nevada.

/s/ Robert J. Bonsignore
Robert J. Bonsignore

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was filed *via* CM/ECF on _____ and as a result has been served on all counsel of record *via* transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Robert Bonsignore